

HAZARDOUS WASTE INSPECTION REPORT
TSD Facilities - Part A

Date of inspection 10/25/83 Time start 0800 Time finish _____
Name of inspector Frank Holmes
Company, installation name Bishop Tube Co.
Location Rt 30 and Malin Rd. Fraser
County Chester Municipality E. Whitland Twp
Identification number PAD08186309
Name of responsible official Maria Johnson
Title Project Engineer
Mailing address Rt 30 + Malin Rd. Fraser, Pa 19355
Area code and phone no. 215-647-3450
Name of person interviewed Maria Johnson
Title _____
Mailing address (if different from above) _____
Area code and phone no. _____

1. Site characterization:

- a. Treatment - surface impoundments, chemical, physical, biological
b. Storage - containers, tanks, surface impoundments, waste piles
c. Disposal - land treatment, landfill, incineration, thermal treatment
d. Use, reuse, recycle, reclaim

2. Does the facility generate hazardous wastes? Yes No

3. Types of hazardous waste produced by Hazardous Waste Number:

N/A

4. Are hazardous wastes transported off-site by the facility? Yes No

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART B General p.1

BT
10/25/83

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

| COMPLIANCE STATUS | | | | REQUIREMENT | CHAPTER CITATION |
|-------------------|---|---|---|--|------------------|
| 1 | 2 | 3 | 4 | | 75.265 |
| X | | | | Part A permit application submitted | (a) (2), (z) (2) |
| X | | | | Identification number | (b) |
| | | X | | Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department | (b) (1) |
| | | X | | Waste streams not covered by permit approved by the Department before acceptance | (c) (1) |
| | | X | | Chemical and physical analyses repeated as required | (c) (1) |
| | | X | | All waste shipments inspected and sampled | (c) (2) |
| | | X | | Waste analysis plan on-site | (c) (3) |
| X | | | | 24 hr. surveillance at active portion | (d) (2) (i) |
| X | | | | Artificial barrier at active portion | (d) (2) (ii) |
| X | | | | Proper signs posted and legible at a distance of at least 25 ft. | (d) (3) |
| X | | | | Inspection schedule on-site | (e) (2) |
| X | | | | Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction | (e) (4) |
| X | | | | Immediate remedial action taken where a hazard is imminent or has already occurred | (e) (4) |
| X | | | | On the job or classroom personnel training program | (f) |
| X | | | | Records retained for each employee at facility of training, job title, and job description | (f) (6), (7) |
| | | X | | Ignitable or reactive wastes separated from source of ignition or reaction | (g) (1) |
| | | X | | No smoking signs displayed where there are hazards from ignitable or reactive wastes | (g) (1) |
| | | X | | Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements | (g) (2) |
| X | | | | Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel | (h) (2) (i) |
| X | | | | Facility equipped with a device for summoning outside emergency assistance | (h) (2) (ii) |
| X | | | | Facility equipped with fire control, spill control, and decontamination equipment | (h) (2) (iii) |
| X | | | | Facility equipped with water at adequate volume and pressure to supply fire control equipment | (h) (2) (iv) |
| X | | | | Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained. | (h) (3) |
| X | | | | Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies | (h) (6) |
| X | | | | Contingency plan on-site and implemented | (i) (1) |
| X | | | | Contingency plan describes action taken by personnel in the event of an | (i) (3) |

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TSD FACILITIES - PART B General p.2.

BT
10/25/83

1 - NON-COMPLIANCE, 2 - COMPLIANCE, 3 - NOT APPLICABLE, 4 - NOT DETERMINED

| COMPLIANCE STATUS | | | | REQUIREMENT | CHAPTER CITATION |
|-------------------|---|---|---|--|------------------|
| 1 | 2 | 3 | 4 | | 75.265 |
| | X | | | Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator. | (i) (6) |
| | X | | | Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item | (i) (7) |
| | X | | | Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary | (i) (8) |
| | X | | | One employee designated as the primary emergency coordinator either on the premises or on call. | (i) (11) |
| | | X | | Facility accepting only PA manifests | (j) |
| | X | | | Manifests properly completed and routed within time limits (24 hrs.) | (j) (2) (3) |
| | | X | | Manifest discrepancies resolved or reported within time limits | (j) (10) (1) |
| | X | | | Written operating record maintained on the premises | (k) |
| | X | | | Written operating record contains description and quantity of wastes and method of treatment, storage or disposal | (k) (2) (i) |
| | X | | | Written operating record contains location and quantity of each hazardous waste | (k) (2) (ii) |
| | | X | | Written operating record contains results of waste analyses and treatability tests | (k) (2) (iii) |
| | X | | | Written operating record contains reports and details of all incidents | (k) (2) (iv) |
| | X | | | Written operating record contains records and results of all inspections | (k) (2) (v) |
| | | X | | Written operating record contains required monitoring, testing, and analytical data | (k) (2) (vi) |
| | | X | | Written operating record contains closure and post-closure cost estimates | (k) (2) (vi) |
| | X | | | All records retained on premises and available for inspection | (l) |
| | X | | | Quarterly reports submitted to the Department | (m) |
| | X | | | Emissions, discharges, fires, explosions, and groundwater contamination reported as required | (m) (2) |
| | | X | | Groundwater monitoring wells located at approved sites | (n) (2) |
| | | X | | Adequate protection of groundwater monitoring wells | (n) (7) |
| | | X | | Groundwater sampling and analysis plan on the premises | (n) (8) |
| | | X | | Groundwater quality assessment and abatement outline on the premises | (n) (14) |
| | X | | | Closure plan on the premises and up-to-date | (o) (2) - (5) |
| | | X | | Post-closure plan on the premises and up-to-date | (o) (10) - (11) |
| | X | | | Annual closure cost estimate on the premises and up-to-date | (p) (2) - (4) |
| | | X | | Annual post-closure cost estimate on the premises and up-to-date | (p) (5) - (7) |

BT
10/25/83

TREATMENT, STORAGE, DISPOSAL FACILITIES - STORAGE (Containers and Tanks)

75.265

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

| COMPLIANCE STATUS | | | | REQUIREMENT | CHAPTER CITATION |
|-------------------|---|---|---|---|---------------------------|
| 1 | 2 | 3 | 4 | | |
| X | | | | Containers managed to prevent leaks and spills | (q) (1), (4) |
| X | | | | Containers are compatible with waste stored. | (q) (2) |
| X | | | | Containers are closed during storage | (q) (3) |
| X | | | | Container storage area inspected weekly for leaks, deterioration, etc. | (q) (5) |
| | X | | | Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line. | (q) (6) |
| | X | | | Satisfactory procedures followed for handling incompatible wastes. | (q) (7), (8) |
| | X | | | Incompatible wastes separated or protected from other materials. | (q) (9) |
| X | | | | Containers and tanks labeled to identify accurately hazardous waste contained. | Act 97 Section 403(b) (f) |
| | X | | | Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material | (r) (2) |
| X | | | | Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing. | (r) (3) |
| | X | | | Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard. | (r) (4) |
| | X | | | Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement | (r) (4) |
| | X | | | Continuously fed tanks equipped with a means to stop the inflow. | (r) (5) |
| X | | | | Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks. | (r) (6) |
| | | X | | Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank. | (r) (7) |
| X | | | | Discharge control equipment inspected once each operating day. | (r) (8) (i) |
| | X | | | Monitoring equipment data inspected once each operating day. | (r) (8) (ii) |
| X | | | | Liquid level of tanks inspected once each operating day. | (r) (8) (iii) |
| X | | | | Construction materials of tanks inspected weekly. | (r) (8) (iv) |
| | X | | | Construction materials of discharge confinement structures and area immediately surrounding inspected weekly. | (r) (8) (v) |
| | X | | | All hazardous waste removed from tanks and related appurtenances at closure. | (r) (9) |
| | X | | | Placement of ignitable or reactive waste only with the Department's approval | (r) (10) |
| | X | | | Covered tanks in which ignitable or reactive waste is treated or stored | (r) (11) |

HAZARDOUS WASTE INSPECTION REPORT

Part C - Comments

Date of inspection 10/25/83 Identification number PAD081668309
Company, Installation name Bishop Tube Co.
County Chester Municipality E. Whitland

The following violations were observed at the time of my inspection

1. The outside hazardous waste storage tanks are not contained. This will be contained by Jan. 1984
2. A small valve is leaking on one of the acid rinse water tanks. It will be replaced with a locking valve by Nov. 15, 1983.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Miss Johnson Date 10/25/83
Inspector (signature) Paul Holman Date 10/25/83

Department of Environmental Resources

1875 New Hope Street
Norristown, PA 19401
215 631-2420

November 3, 1983

Mr. Miers Johnson
Bishop Tube Company
Route 30 and Malin Road
Frazer, PA 19355

Re: Hazardous Waste Inspection
October 25, 1983

NOTICE OF VIOLATION

Dear Mr. Johnson:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

1. The outside hazardous waste storage tanks are not contained.
75.265(r)(6).
2. A small valve leaking on one of the acid rinse water tanks.
75.265(h)(1).

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

Mr. Miers Johnson

November 3, 1983

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This letter shall also not be construed as a final action of the Department of Environmental Resources.

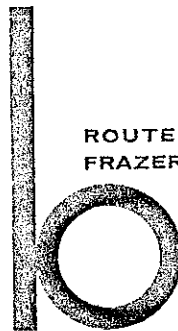
If you have any questions concerning this matter, please feel free to contact me at 631-2420.

Very truly yours,

FRANK HOLMES
Solid Waste Specialist

cc: ~~B. Reitler~~
N. Smap, Water Quality Management
Division of Hazardous Waste
Re ER6-35

Bishop Tube Co.



DER-RECEIVED
NORRISTOWN

NOV 22 1983

ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355

PHONE: (215) 647-3450 TWX 510-668-5428 TELEX 83-4511

November 18, 1983

Pennsylvania Department of Environmental Resources
1875 New Hope Street
Norristown, PA 19401

Attention: Mr. Frank Holmes

Reference: Notice of Violation re Hazardous Waste Inspection on
October 25, 1983

Gentlemen:

The referenced letter was not received until November 15, as I told Mr. Victor Janosik by telephone today.

The leaking valve was turned off upon discovery and was corrected right after Mr. Holmes departed. The plastic valve that was dripping had the handle installed backwards, so that the valve could be rotated past the OFF position. I turned the valve off, removed the handle and put it into my desk drawer. I am the only person who uses that sampling valve.

Workman had been working in that area on October 26, installing a filler pipe for the new hydrofluoric acid storage tank. Evidentially someone bumped into that sampling valve and moved the handle just enough to cause it to drip. We are confident that removing the valve handle will prevent reoccurrence.

Containment of the outside hazardous waste storage tanks will be proposed by a plan to be submitted by Bishop Tube by December 15, 1983.

Bishop Tube's Part B application to D.E.R. is due by December 1, only six working days from today. In that application we shall state that a plan for

Pennsylvania Department of Environmental Resources
November 18, 1983
Page -2-

containment will be submitted by December 15. There is just not enough time to submit that plan earlier.

We respectfully request that the additional time for submission of the plan for containment be approved.

Very truly yours,

BISHOP TUBE COMPANY

A handwritten signature in cursive script that reads "Miers C. Johnson". The signature is written in dark ink and is positioned above the typed name and title.

Miers C. Johnson
Project Engineer

HAZARDOUS WASTE INSPECTION REPORT
Generators -Part A

Date of inspection Sept 24, 1986 Time start 9:00 Time finish 12:30
Name of inspector Carol Kurtz
Company, installation name Bishop Tube Co.
Location Rt 30 + Malin Rd, Frazer
County Chester Municipality E. Whiteland Twp.
Identification number PA 0081868309
Name of responsible official Alan Moleton
Title Project Engineer
Mailing address PO Box 1187 Rt 30 + Malin Rd Frazer PA 19355
Area code and phone no. 215-647-3450
Name of person interviewed Same
Title "
Mailing address (if different from above) Same as above
Area code and phone no. " " "

1. Current waste handling method:

- a. On-site treatment, storage, disposal
b. On-site use, reuse, recycle, reclaim
c. Off-site treatment, storage, disposal D002, K062, F001
d. Off-site use, reuse, recycle, reclaim P001

2. Amount of hazardous waste produced:

- a. ~ 22,200 kg./mo.
b. 266,400 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

K062, F001, D001, D002

4. Are hazardous wastes transported off-site by the generator? Yes No

Date of Inspection Sept 24, 1986 Identification Number PAD 081868309
Company, Installation Name Bishop Tube Co.
County Chester Municipality E. Whiteland Twp

Denominator inspection

At the time of this inspection the following was observed:

- ① Drums in hazardous waste storage area - Not all drums were labeled with accumulation date and haz. waste numbers. (Drums are labeled with a plant waste ID # though). Several drums are stored over the 90 day period - NOTE - facility did have interim status for storage that has withdrawn Part B for storage.
- ② PPC Plan - Update emergency coordinator.
- ③ Manifest Review - (Review only from 1-2-86 to present) Manifest # NSA 0213747 missing container number + type (12) and unit weight/volume (14); Manifest # NSA 0155313 - missing Generator's Certification signature and date; Manifest # NSA 0155322 - Transporter + generator dated 4/15/86 but TSD dated 5/15/86.

Continued on next page.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____
Inspector (signature) Carol Kutz Date 9-24-86

1. EPA ID= PA100811868361

2. HANDLER NAME: Bishop Tube Company

3. ADDRESS: Rt 30 + Malin Rds Frazer PA

4. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 9/24/86

5. AGENCY RESPONSIBLE FOR EVALUATION:
Put code in box 5
Choose one

0 = Other
B = Contractor/State
X = Oversight

E = EPA
S = State
J = Joint
C = Contractor/EPA

6. TYPE OF EVALUATION COVERED BY THIS REPORT: 1

Put code in box
Choose one

6 = Other - Citizen Complaint
7 = Other - Part B Call-In
8 = Other - Withdrawal Candidate
9 = Other - Closed Facility
10 = Other - General

1 = Evaluation Inspection
2 = Sampling Inspection
3 = Record Review
4 = Ground Water Monitoring Evaluation
5 = Follow Up

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): / /

8. AREA AND CLASS OF VIOLATION (enter 'X' in appropriate box if violations found. Enter '0' if no violations found in Area Violated.)

| Class of Violation | Area of Violation | | | | |
|--------------------|-------------------|-------|----------|-------|-------|
| | GM | CL/PC | Fin. Res | Pt. B | Other |
| I | | | | | X |
| II | | | | | 0 |

9. ENFORCEMENT ACTIONS:

| Class | Area of Violation (use code) | Date Action Taken | Compliance Dates | | Penalty Assessed | Penalty Collected | Resp. Ag. (use code) |
|-------|------------------------------|-------------------|------------------|--------|------------------|-------------------|----------------------|
| | | | Scheduled | Actual | | | |
| 1 | Other 03 | 9-25-86 | 10-31-86 | | | | |

Codes for Types of Enforcement Actions: 03 = Warning Letter
05 = Administrative Order
10 = Informal
(See instructions for additional codes)

Codes for Resp. Agency: E = EPA
S = State
X = EPA
oversight

11 = Filed Civil Action
12 = Filed Criminal Action
15 = \$3008(h) Final Order

9a. STATUS OF HANDLER WITH COMPLIANCE SCHEDULE OF ORDERS: Meeting compliance schedule Yes No No De- / - / -

10. Comments: Closure inspection for PSD - storage. Drums still being stored over 90 days.

(Limit each comment to 80 characters. Up to 99 comments are possible.)

Part C - Comments

Date of Inspection Sept 24, 1986 Identification Number PAD081868309
Company, Installation Name Bishop Tube Co
County Chester Municipality E. White Land Twp.

Closure Inspection: Facility was operating under interim status for storage.

At the time of this inspection there are still several drums which have been stored for over 90 days.

These drums will be removed and disposed of by October 31, 1986.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) [Signature] Date 9/24/86
Inspector (signature) [Signature] Date 9-24-86

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part A

Compliance Inspection

Date of inspection Dec 2, 1986 Time start 9⁰⁰ Time finish 10-05

Name of inspector Carol Kurtz

Company, installation name Bishop Tube Co

Location Rt 30 + Malin Rd, Frazer

County Chester Municipality E. Whiteland Twp.

Identification number PAD081868309

Name of responsible official Dave Molton

Title Project Engineer

Mailing address PO Box 1189 Rt 30 + Malin Rd, Frazer PA 19355

Area code and phone no. 215-647-3450

Name of person interviewed Dave Molton

Title Same

Mailing address (if different from above) "

Area code and phone no. "

1. Current waste handling method:

- a. On-site treatment, storage, disposal
- b. On-site use, reuse, recycle, reclaim
- c. Off-site treatment, storage, disposal D002, K062, F001
- d. Off-site use, reuse, recycle, reclaim D001

2. Amount of hazardous waste produced:

a. ~ 22,200 kg./mo.

b. 266,400 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

K062, F001, D001, D002

4. Are hazardous wastes transported off-site by the generator? Yes No

HAZARDOUS WASTE INSPECTION REPORT
TSD Facilities - Part A

CLOSURE INSPECTION

Date of inspection Dec 2, 1986 Time start 9:00 Time finish 10:05

Name of inspector Carol Kurby

Company, installation name Bishop Tube Co.

Location Rt 30 + Malin Rd, Frazer

County Chester Municipality E. Whiteland Twp.

Identification number PA12081868309

Name of responsible official Dave Moleton

Title Project Engineer

Mailing address PO Box 1189 Rt 30 + Malin Rd Frazer PA 19355

Area code and phone no. 215-647-3450

Name of person interviewed same

Title "

Mailing address (if different from above) "

Area code and phone no. "

1. Site characterization:

- a. Treatment - surface impoundments, chemical, physical, biological
- b. Storage - containers, tanks, surface impoundments, waste piles
- c. Disposal - land treatment, landfill, incineration, thermal treatment
- d. Use, reuse, recycle, reclaim

2. Does the facility generate hazardous wastes? Yes No

3. Types of hazardous waste produced by Hazardous Waste Number:

K062, D001, D002, F002

4. Are hazardous wastes transported off-site by the facility? Yes No

FY 1986 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. EPA ID: PA10181869309

2. HANDLER NAME: Bishop Tube Co

3. ADDRESS: Rt 30 & Malin Rd Frazer PA

4. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 9/24/86

5. AGENCY RESPONSIBLE FOR EVALUATION: Put code in box 5
Choose one

E = EPA
S = State
J = Joint
C = Contractor/EPA

O = Other
B = Contractor/State
X = Oversight

6. TYPE OF EVALUATION COVERED BY THIS REPORT: Put code in box Choose one 5

1 = Evaluation Inspection
2 = Sampling Inspection
3 = Record Review
4 = Ground Water Monitoring Evaluation
5 = Follow Up

6 = Other - Citizen Complaint
7 = Other - Part B Call-In
8 = Other - Withdrawal Candidate
9 = Other - Closed Facility
10 = Other - General

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 12/2/86

8. AREA AND CLASS OF VIOLATION (enter 'X' in appropriate box if violations found. Enter '0' if no violations found in Area violated.)

| Class of Violation | Area of Violation | | | | | | |
|--------------------|-------------------|-------|----------|-------|------------|----------|-------|
| | GSM | CL/PC | Fin. Res | Pt. B | Compl. Sch | Manifest | Other |
| I | | | | | | | 0 |
| II | | | | | | | X |

9. ENFORCEMENT ACTIONS:

| Class | Area of Violation | Type (use code) | Date Action Taken | Compliance Dates | | Penalty | | Resp. Ag. (use code) |
|-------|-------------------|-----------------|-------------------|------------------|--------|----------|-----------|----------------------|
| | | | | Scheduled | Actual | Assessed | Collected | |
| II | Other | 10 | 12-2-86 | 12-2-86 | | | | |

Codes for Types of Enforcement Actions: 03 = Warning Letter
05 = Administrative Order
10 = Informal

11 = Filed Civil Action
12 = Filed Criminal Action
15 = §3008(h) Final Order

Codes for Resp. Agency: E = EPA
S = State
X = EPA oversight

(See instructions for additional codes)

9a. STATUS OF HANDLER WITH COMPLIANCE SCHEDULE OF ORDERS: Meeting compliance schedule Yes No Dt. /--/--

10. Comments: Generator compliance inspection - all violations have been corrected. But drums of hazwaste not stored in storage area.
(Limit each comment to 80 characters. Up to 99 comments are possible.)

FY 1986 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. EPA ID: PA1001818183611
 2. HANDLER NAME: Bishop Tube Company
 3. ADDRESS: Rt 30 + Malin Rds. Frazer PA

4. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 9/24/86
 5. AGENCY RESPONSIBLE FOR EVALUATION: Put code in box S
 Choose one: E = EPA, S = State, J = Joint, C = Contractor/EPA, O = Other, B = Contractor/State, X = Oversight

6. TYPE OF EVALUATION COVERED BY THIS REPORT: Put code in box Choose one 3
 1 = Evaluation Inspection, 2 = Sampling Inspection, 3 = Record Review, 4 = Ground Water Monitoring Evaluation, 5 = Follow Up, 6 = Other - Citizen Complaint, 7 = Other - Part B Call-In, 8 = Other - Withdrawal Candidate, 9 = Other - Closed Facility, 10 = Other - General

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): / /

8. AREA AND CLASS OF VIOLATION (enter 'X' in appropriate box if violations found. Enter '0' if no violations found in Area violated.)
 (2. least severe.)

| Class of Violation | Area of Violation | | | | | | |
|--------------------|-------------------|-------|----------|-------|-----------|----------|-------|
| | OWM | CL/PC | Fin. Res | Pt. B | Capl. Sch | Manifest | Other |
| I | | | | | | 0 | |
| II | | | | | | X | |

9. ENFORCEMENT ACTIONS:

| Class | Area of Violation | Type (use code) | Date Action Taken | Compliance Dates | | Penalty | | Resp. Ag. (use code) |
|-------|-------------------|-----------------|-------------------|------------------|---------|----------|-----------|----------------------|
| | | | | Scheduled | Actual | Assessed | Collected | |
| II | Manifest | 10 | 9-24-86 | 9-24-86 | 9-24-86 | | | |

Codes for Types of Enforcement Actions: 03 = Warning Letter, 05 = Administrative Order, 10 = Informal, 11 = Filed Civil Action, 12 = Filed Criminal Action, 15 = \$3008(h) Final Order
 Codes for Resp. Agency: E = EPA, S = State, X = EPA oversight
 (See instructions for additional codes)

9a. STATUS OF HANDLER WITH COMPLIANCE SCHEDULE OF ORDERS: Meeting compliance schedule Yes No Dr. / - / - -

10. Comments: 3 manifests missing various information - Generator inspection.
 (Limit each comment to 80 characters. Up to 99 comments are possible.)

FILE: Chester Co - Bishop Tube Co.

FY 1986 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. EPA ID: PA00818683091

2. HANDLER NAME: Bishop Tube Co.

3. ADDRESS: Rt 30 + Malin Rd Frazer PA

4. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 9/24/86

5. AGENCY RESPONSIBLE FOR EVALUATION:
Put code in box
Choose one

E = EPA
S = State
J = Joint
C = Contractor/EPA
O = Other
B = Contractor/State
X = Oversight

6. TYPE OF EVALUATION COVERED BY THIS REPORT:
Put code in box
Choose one

1 = Evaluation Inspection
2 = Sampling Inspection
3 = Record Review
4 = Ground Water Monitoring Evaluation
5 = Follow Up

6 = Other - Citizen Complaint
7 = Other - Part B Call-In
8 = Other - Withdrawal Candidate
9 = Other - Closed Facility
10 = Other - General

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 12/2/86

| 8. AREA AND CLASS OF VIOLATION (enter 'X' in appropriate box if violations found. Enter '0' if no violations found in Area violated.) | Class of Violation | Area of Violation | | | | | | |
|--|--------------------|-------------------|-------|---------|-------|-----------|----------|-------|
| | | GSM | CL/PC | Fin.Res | Pt. B | Compl.Sch | Manifest | Other |
| I | | | 0 | | | | | |
| II | | | 0 | | | | | |

9. ENFORCEMENT ACTIONS:

| Class | Area of Violation | Type (use code) | Date Action Taken | Compliance Dates | | Penalty | | Resp. Ag. (use code) |
|-------|-------------------|-----------------|-------------------|------------------|--------|----------|-----------|----------------------|
| | | | | Scheduled | Actual | Assessed | Collected | |
| | | | | | | | | |

Codes for Types of Enforcement Actions:
03 = Warning Letter
05 = Administrative Order
10 = Informal
(See instructions for additional codes)

11 = Filed Civil Action
12 = Filed Criminal Action
15 = §3008(h) Final Order

Codes for Resp. Agency: E = EPA
S = State
X = EPA oversight

9a. STATUS OF HANDLER WITH COMPLIANCE SCHEDULE OF ORDERS: Meeting compliance schedule Yes No Dr. / - / - -

10. Comments: Closure inspection - facility had interim status to store. Facility is not storing waste over 90 days.
(Limit each comment to 80 characters. Up to 99 comments are possible.)

Hazardous Waste Inspection Report Generators - Part A

Date of inspection March 8, 1988 Time start 1:00pm Time finish 3:10
 Name of inspector Brian K. Boyd
 Company, installation name Bishop Tube Co.
 Location Route 30 and Main Rd Frazer, Pa. 19355
 County Chester Municipality E. Whiteland
 Identification number PAD 081868309
 Name of responsible official Russell Levering
 Title Plant Manager
 Mailing address P.O. Box 1189 Frazer, Pa. 19355
 Area code and telephone number (215)
 Name of person interviewed Dave Moleton
 Title Project Engineer
 Mailing address (if different from above) Same
 Area code and telephone number _____

1. Current waste handling method:

- | | | | | | |
|----|--|--|-----------------------------------|--|----------------------------------|
| a. | <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. | <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. | <input checked="" type="checkbox"/> Off-site | <input checked="" type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. | <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 556,515 lb/Qt ~~kg~~/mo.
 b. 2,226,060 ~~kg~~/yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

K06Z F00Z
D001, Z

4. Are hazardous wastes transported off-site by the generator? Yes No

**Hazardous Waste Inspection Report
Comments - Part C**

Date of Inspection March 8, 1988 Identification Number DAD 081868309
Company, Installation Name Bishop Tube Co.
County Chester Municipality F. Whiteford

Bishop Tube facility is a Large Quantity Gen. of Hazardous Waste. Previous Part B application withdrawn final closure granted. During this inspection the following were observed:

1. Drums ^{of haz. waste} were not properly labelled with accumulation dates. All drums will be labelled by March 15, 1988.
2. Drums of haz. waste are being stored over the 90 day storage period. All drums of haz. waste exceeding this period will be shipped off-site by March 29, 1988.
3. The (2) two 5600 gal tanks used to store the K062 pickle liquor waste should be labelled as "Hazardous waste K062". These tanks will be labelled by March 15, 1988.
4. No classroom personnel ~~and~~ training was performed/ documented for 1987. Personnel training will be performed by June 8, 1988.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) [Signature] Date 3/8/88
Inspector (signature) [Signature] Date 3/8/88

Regional File

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection June 15, 1984 Time start 2:00 pm Time finish 3:00 pm
 Name of inspector Brian K. Boyd
 Company, installation name Bishop Tube Co.
 Location Route 30 and Malin Rd. Frazer, Pa. 19355
 County Chester Municipality East Whiteland
 Identification number PAD 081868309
 Name of responsible official Russell Leverage George Mayer
 Title General Plant Manager
 Mailing address P.O. Box 1189 Frazer, Pa. 19355
 Area code and telephone number (215) 647-3450
 Name of person interviewed Dave Moleton
 Title Project Engineer
 Mailing address (if different from above) same
 Area code and telephone number _____

Follow-up Inspection

1. Current waste handling method:

- | | | | | | |
|----|--|--|-----------------------------------|--|----------------------------------|
| a. | <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. | <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. | <input checked="" type="checkbox"/> Off-site | <input checked="" type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. | <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

a. _____ kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

4. Are hazardous wastes transported off-site by the generator? Yes No

Inspection Report Comments

Date of Inspection June 15, 1988 Identification Number DAD081868309
Company/Facility/Site Name Bishop Tube Co.

This inspection was a follow-up inspection to the March 8, 1988 inspection. The following violations were corrected:

- 1) All hazardous waste exceeding the 90-day storage period was shipped off-site on 3/21/88.
- 2) All holding tanks storing the K062 waste have been labelled as required.
- 3) Training of personnel in RCRA requirements was performed in May and documented as such.

During this 6/15/88 inspection, the following was observed:

- 1) There are 6 drums containing hazardous waste pickling sludge which have no accumulation dates.
- 2) There are approximately 75 drums of various known and unknown waste materials being stored in the Hazardous Waste Storage Bldg. Mr. Moleton stated the some of these materials have been there since 1980. These wastes should be identified and properly disposed of at a permitted disposal facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were observed during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification may be forthcoming, confirming any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

[Signature]

Date

6/15/88

Inspector (signature)

[Signature]

Date

6/15/88

Page ___ of ___

Inspection Report Comments

Date of Inspection 6/15/88 Identification Number PAIDC81868309
Company/Facility/Site Name Bishop Tube Co.

The facility has withdrawn a RCRA Part B Storage permit application, and developed and implemented a RCRA Closure Plan. The hazardous waste storage area was inspected, and no hazardous wastes are presently being stored over the 90-day storage period.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were observed during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification may be forthcoming, confirming any violations indicated herein and listing any additional violations.

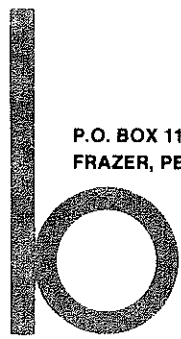
This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) [Signature] Date 6/15/88
Inspector (signature) [Signature] Date 6/15/88
Page of

Regional File
Chester Co.
E. White/ku

Bishop Tube Co.
DEPARTMENT OF
ENVIRONMENTAL RESOURCES
JUL 18 1988
DELAWARE COUNTY OFFICE



P.O. BOX 1189
FRAZER, PENNSYLVANIA 19355

PHONE: (215) 647-3450 TWX 910-380-9487

July 12, 1988

Mr. Brian K. Boyd
Waste Management Specialist
Pennsylvania D.E.R.
Ridley Creek State Park
E. Sycamore Mills Road
Media, PA. 19063

Dear Mr. Boyd:

In response to your NOTICE OF VIOLATION dated June 28, 1988; I have informed Management and Production Personnel of the importance of starting dates on hazardous waste drums. I will follow up by inspecting these areas each week.

We are in the process of sorting, and assembling for removal, the drums of waste material that are located in the hazardous waste storage building. This material will be disposed of properly, no later than October 14th.

Sincerely,

BISHOP TUBE COMPANY

David F. Moleton
Project Engineer

DFM/mfa
cc/ George W. Meyer
Russell G. Levering

**Hazardous Waste Inspection Report
Generators - Part A**

Date of inspection October 17, 1988 Time start 10:00 Am Time finish 11:30 Am
 Name of inspector Brian K. Boyd
 Company, installation name Bishop Tube Co.
 Location Route 30 and Malin Rd. Frazer, Pa. 19355
 County Chester Municipality East Whiteland
 Identification number PAD 081868309
 Name of responsible official George Mayer
 Title Plant Manager
 Mailing address P.O. Box 1789 Frazer, Pa. 19355
 Area code and telephone number _____
 Name of person interviewed Russell G. Levening
 Title Plant Engineer
 Mailing address (if different from above) same as above
 Area code and telephone number _____

1. Current waste handling method:

- a. On-site treatment, storage, disposal PBR
- b. On-site use, reuse, recycle, reclaim
- c. Off-site treatment, storage, disposal
- d. Off-site use, reuse, recycle, reclaim

2. Amount of hazardous waste produced:

- a. _____ kg./mo.
- b. ~ 2,226,000 lb kg/yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

K06Z F002,1
D001,2

4. Are hazardous wastes transported off-site by the generator? Yes No

Inspection Report Comments

Date of Inspection October 17, 1988 Identification Number PAD081868309

Company/Facility/Site Name Bishop Tube Co

This inspection was performed on 10/17/88 at Bishop Tube Co. Inspection was performed with Ms. Nancy Conzetti (Compliance specialist), Mr. Russ Levering, and myself. ~~this report~~ During this inspection the following was observed:

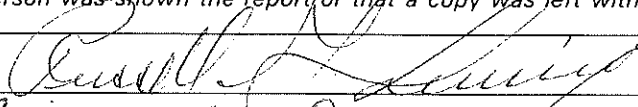
- 1) 6 drums containing hazardous waste pickling sludge observed during last inspection (with no account dates) have been shipped off-site.
- 2) The non-hazardous drums in the drum storage area have been categorized and identified, most observed during last inspection have been shipped off-site for disposal.
- 3) No new violations observed during this inspection.

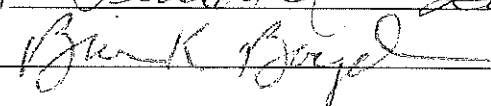
In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were observed during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification may be forthcoming, confirming any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report, or that a copy was left with the person.

Person Interviewed (signature)  Date _____

Inspector (signature)  Date 10/17/88
Page _____ of _____

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection June 5, 1991 Time start _____ Time finish _____

Name of inspector Paul Park

Company, installation name Bishop Tube Co.

Location Rt 30 & Millers Rd FRAZER PA 19355

County Chester Municipality East Whiteland

Identification number PAD021268309

Name of responsible official Russell G. Levering

Title Plant Engineer

Mailing address PO Box 1189 FRAZER PA 19355

Area code and telephone number (215) 647-3450

Name of person interviewed SAME AS ABOVE

Title _____

Mailing address (if different from above) SAME AS ABOVE

Area code and telephone number _____

1. Current waste handling method:

- a. On-site treatment, storage, disposal PBR
- b. On-site use, reuse, recycle, reclaim
- c. Off-site treatment, storage, disposal
- d. Off-site use, reuse, recycle, reclaim

2. Amount of hazardous waste produced:

- a. _____ kg./mo.
- b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

| Waste Number | Destination Facility | Location and Type |
|------------------------|-------------------------|-------------------|
| <u>K902</u> | <u>WASTE CONVERSION</u> | |
| <u>D502, 2, 40, 19</u> | | |
| <u>F002</u> | | |
| <u>F001</u> | <u>MAR</u> | |

Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

| 1-No Violation Observed | | | | | 2-Not Applicable | | | | | 3-Not Determined | | | | | 4-Non-Compliance | | | | |
|-------------------------|---|---|---|---|------------------|--|--|--|--|------------------|--|--|--|--|------------------|----------------------------|--|--|--|
| Status | | | | REQUIREMENT | | | | | | | | | | | | Citation | | | |
| 1 | 2 | 3 | 4 | | | | | | | | | | | | | 40 CFR Part 268 | | | |
| | | | | Generators | | | | | | | | | | | | | | | |
| X | | | | Notification sent with shipments of wastes that do not meet treatment standards. | | | | | | | | | | | | 7(a)(1) | | | |
| | X | | | Notification and certification sent with shipments of wastes meeting treatment standards. | | | | | | | | | | | | 7(a)(2) | | | |
| X | | | | Dilution not used as a substitute for treatment. | | | | | | | | | | | | 3 | | | |
| X | | | | Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification. | | | | | | | | | | | | 7(a)(5), (a)(6) | | | |
| | | | | Storage Facilities | | | | | | | | | | | | | | | |
| | | | | Facility verifies generators classification of waste in accordance with waste analysis plan. | | | | | | | | | | | | 25 Pa Code 265.13(c) | | | |
| | | | | Containers marked to identify contents and accumulation date. | | | | | | | | | | | | 50(a)(2) | | | |
| | | | | Notification sent with shipments of wastes that do not meet treatment standards. | | | | | | | | | | | | 7(a)(1) | | | |
| | | | | Notification and certification sent with shipments of wastes meeting treatment standards. | | | | | | | | | | | | 7(a)(2) | | | |
| | | | | Facility maintains records of documents produced pursuant to LDR requirements. | | | | | | | | | | | | 7(a)(6) | | | |
| | | | | Treatment Facilities, including PBR and RRR Facilities | | | | | | | | | | | | | | | |
| | | | | Dilution not used as a substitute for treatment. | | | | | | | | | | | | 3 | | | |
| | | | | Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan. | | | | | | | | | | | | 7(b) | | | |
| | | | | Certification and/or notification sent with shipments of waste. | | | | | | | | | | | | 7(b)(4), (b)(5), (b)(6) | | | |
| | | | | Land Disposal Facilities | | | | | | | | | | | | | | | |
| | | | | Facility tests wastes received to assure compliance with applicable treatment standards. | | | | | | | | | | | | 7(c)(2) | | | |
| | | | | Facility land disposes of restricted waste only if it meets applicable treatment standard. | | | | | | | | | | | | 40 | | | |
| | | | | Facility retains copies of generator notifications and certifications. | | | | | | | | | | | | 7(c)(1) | | | |

Inspection Report

E. Whitcomb Top.
Chester Co.

Regional

FY 1990 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. EPA ID: PA10018118161813191

4. Data Entry

2. HANDLER NAME: Bishop Tube Co.

How

3. ADDRESS: Rt 304 Malin Rd Frazer Pa

Update

4. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT:

2/24/91

5a. AGENCY RESPONSIBLE FOR EVALUATION:
Put code in box

5

E = EPA
S = State
C = Contractor/EPA
O = Other
B = Contractor/State
X = Oversight

6. TYPE OF EVALUATION COVERED BY THIS REPORT:

SELECT EVALUATION Type and insert in box:

5

1 = Compliance Eval. Inspection (CSI) 4 = Comp GWM Eval (CXE)
2 = Sampling Inspection 5 = Compliance Sched. Eval
3 = Record Review 11 = Case Dev. Inspection
12 = GWM Inspection

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 6/5/91

8a. Eval. Comments:

9. CLASS and VIOLATIONS

Key

'X' = Violations, no Specialties
'B' = Violations & Specialty
'S' = Same Viol./Specialty
'Z' = Pending Determination
'O' = No Viol or Specialty found

'I' = No Insurance only
'C' = CA Schedule Violation
'N' = NPY

• = Class I only

| Class of Violation | Acceptable Codes | | | | | | | |
|--------------------|------------------|------|----------|-------|------------|----------|----------|-------|
| | GWM | C/PC | Fin. Res | Pr. B | Compl. Sch | Manifest | Land-Ban | Other |
| I | | | | | | | | 0 |
| II | | | | | | | | |
| | X | X | X | X | X | X | X | X |
| | S | S | S | S | S | S | S | S |
| | Z | Z | Z | Z | Z | Z | Z | Z |
| | O | O | O | O | O | O | O | O |
| | H | H | I* | H | C | H | H | H |
| | | | B* | | B | | | |
| | | | H | | H | | | |

8a. Viol Comment: Class I Violations Abated -> No Violations observed

9. ENFORCEMENT ACTIONS:

| Class | Area of Viol./rel. | Type (use code) | Date Action Taken | Compliance Dates | | Penalty | | Resp. Agency (use code) |
|-------|--------------------|-----------------|-------------------|------------------|--------|----------|-----------|-------------------------|
| | | | | Scheduled | Actual | Assessed | Collected | |
| I | OT | 03 | 3/5/91 | | 6/5/91 | | | |
| | | | | | | | | |

| | | | | |
|---|--|---|---|--|
| Codes for Types of Enforcement Actions: | 03 = Warning Letter 04 = Adm. Complaint 05 = Final Adm. Order 10 = Informal | 11 = filed Civil Action 12 = Filed Criminal Action 18 = Civil Referral to AG/DOJ 19 = Final Judicial Order | 15 = CA Init. Adm Order 16 = CA Final Adm Order 21 = Notice of Non-Comp 22 = FFCA 23 = Fed. Fac. Referral to HQ | Resp Agency Codes E = EPA S = State X = EPA Oversight |
|---|--|---|---|--|

10. Enforc. Comment:

**Hazardous Waste Inspection Report
TSD Facilities - Part A**

Date of inspection November 5, 1991 Time start 12:45 Time finish _____

Name of inspector Paul V. Panek

Company, installation name Bishop Tube Co.

Location Rt 30 + Malin Rd. Frazer

County Chester Municipality E. Whiteland

Identification number PA0081868309

Name of responsible official Russell G. Levering

Title Plant Engineer

Mailing address P.O. Box 1189 Frazer Pa 19355

Area code and telephone number (215) 647-3450

Name of person interviewed SAME AS ABOVE

Title - " "

Mailing address (if different from above) _____

Area code and telephone number _____

1. Site characterization:

- a. Treatment - surface impoundments chemical physical biological
- b. Storage - containers tanks surface impoundments waste piles
- c. Disposal - land treatment landfill incineration thermal treatment
- d. Use reuse recycle reclaim

2. Does the facility generate hazardous wastes? Yes No

3. Types of hazardous waste produced by Hazardous Waste Number:

4. Are hazardous wastes transported off-site by the facility? Yes No



EVALUATION - VIOLATION - ENFORCEMENT FORM I

HANDLER

ID Number: PA 081868307 LDF [] TSP [X] INC [] LOG [] SOG [] TRA [] Date Submitted: 1/10/91
 Handler Name: Bishop Tube Co.

Street: Rt 30 + Malin Rd City: FRAZER

EVALUATION Add Change [] Delete []

Date: 1/10/91 Number: [] Agency: S Type: C: E: I Reason: [] Branch: [] Person: []

Areas of Evaluation (E - Evaluated, NE - Not Evaluated, NA - Not Applicable)

| | | | | | | | | | | | | | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|-----|--------------------------|--------------------------|-----|--------------------------|---|--------------------------|
| <input type="checkbox"/> | GOR | <input type="checkbox"/> | TGR | <input type="checkbox"/> | DCR | <input type="checkbox"/> | DGW | <input type="checkbox"/> | DMC | <input type="checkbox"/> | E | DPP | <input type="checkbox"/> | CAS | <input type="checkbox"/> | | |
| <input type="checkbox"/> | GPT | <input type="checkbox"/> | TMR | <input type="checkbox"/> | DCL | <input type="checkbox"/> | DIN | <input type="checkbox"/> | DMR | <input type="checkbox"/> | | DSI | <input type="checkbox"/> | FEA | <input type="checkbox"/> | | |
| GGR | <input type="checkbox"/> | GRR | <input type="checkbox"/> | TOR | <input type="checkbox"/> | DCP | <input type="checkbox"/> | DLB | <input type="checkbox"/> | E | DOR | <input type="checkbox"/> | E | DTR | <input type="checkbox"/> | E | <input type="checkbox"/> |
| GLB | <input type="checkbox"/> | GSC | <input type="checkbox"/> | | <input type="checkbox"/> | DFR | <input type="checkbox"/> | DLF | <input type="checkbox"/> | | | <input type="checkbox"/> | | DTT | <input type="checkbox"/> | | <input type="checkbox"/> |
| GHR | <input type="checkbox"/> | GSO | <input type="checkbox"/> | TWD | <input type="checkbox"/> | DGS | <input type="checkbox"/> | E | DLT | <input type="checkbox"/> | | DPS | <input type="checkbox"/> | DWP | <input type="checkbox"/> | | <input type="checkbox"/> |

Comments: TCLP Evaluated

VIOLATION Add [] Change [] Delete []

Agency: [] Number: [] Area: [] Class: [] Regulation Type: [] Regulation Citation: []
 Date Determined: [] Priority: [] Branch: [] Person: []
 Returned to Compliance Scheduled: [] Actual: []

Comments: []

VIOLATION Add [] Change [] Delete []

Agency: [] Number: [] Area: [] Class: [] Regulation Type: [] Regulation Citation: []
 Date Determined: [] Priority: [] Branch: [] Person: []
 Returned to Compliance Scheduled: [] Actual: []

Comments: []

VIOLATION Add [] Change [] Delete []

Agency: [] Number: [] Area: [] Class: [] Regulation Type: [] Regulation Citation: []
 Date Determined: [] Priority: [] Branch: [] Person: []
 Returned to Compliance Scheduled: [] Actual: []

Comments: []

VIOLATION Add [] Change [] Delete []

Agency: [] Number: [] Area: [] Class: [] Regulation Type: [] Regulation Citation: []
 Date Determined: [] Priority: [] Branch: [] Person: []
 Returned to Compliance Scheduled: [] Actual: []

Comments: []



Regional Copy 1 Inspection Report 18 Whitehouse Twp Chester
EVALUATION - VIOLATION - ENFORCEMENT FORM

HANDLER:
 ID Number PA 0081868309 LDF TSF IWC LOG SOG TRA Date Submitted 11/19/99
 Handler Name Bishop Tube Co.

Street Rt 30 + Main Rd City FRAZER

EVALUATION Add Change Delete

Date 11/19/99 Number Agency # S Type # C:EI Reason Branch Person
 Areas of Evaluation (E - Evaluated, NE - Not Evaluated, NA - Not Applicable)
 GOR TGR DCN DGM DMC DPP CAS
 GPT TMR DCL DIM DMR DSI FEA
 GGR GRR TOR DCP DLB DOR DTR
 GLB GSC DFR DLF DTT
 GMR GSQ TWD DGS DLT DPB DWP

Comments TELP evaluated & # NOT YET ASSIGNED

VIOLATION Add Change Delete

Agency # Number # Area # Class # Regulation Type Regulation Citation
 Date Determined Priority Branch Person
 Returned to Compliance Scheduled Actual

Comments

VIOLATION Add Change Delete

Agency # Number # Area # Class # Regulation Type Regulation Citation
 Date Determined Priority Branch Person
 Returned to Compliance Scheduled Actual

Comments

VIOLATION Add Change Delete

Agency # Number # Area # Class # Regulation Type Regulation Citation
 Date Determined Priority Branch Person
 Returned to Compliance Scheduled Actual

Comments

VIOLATION Add Change Delete

Agency # Number # Area # Class # Regulation Type Regulation Citation
 Date Determined Priority Branch Person
 Returned to Compliance Scheduled Actual

Comments

Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

| 1-No Violation Observed | | | | 2-Not Applicable | 3-Not Determined | 4-Non-Compliance |
|-------------------------|---|---|---|---|------------------|-------------------------|
| Status | | | | REQUIREMENT | | Citation |
| 1 | 2 | 3 | 4 | | | 40 CFR Part 268 |
| | | | | Generators | | |
| X | | | | Notification sent with shipments of wastes that do not meet treatment standards. | | 7(a)(1) |
| | X | | | Notification and certification sent with shipments of wastes meeting treatment standards. | | 7(a)(2) |
| X | | | | Dilution not used as a substitute for treatment. | | 3 |
| X | | | | Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification. | | 7(a)(5), (a)(6) |
| | | | | Storage Facilities | | |
| | Y | | | Facility verifies generators classification of waste in accordance with waste analysis plan. | | 25 Pa Code 265.13(c) |
| | X | | | Containers marked to identify contents and accumulation date. | | 50(a)(2) |
| | X | | | Notification sent with shipments of wastes that do not meet treatment standards. | | 7(a)(1) |
| | X | | | Notification and certification sent with shipments of wastes meeting treatment standards. | | 7(a)(2) |
| | X | | | Facility maintains records of documents produced pursuant to LDR requirements. | | 7(a)(6) |
| | | | | Treatment Facilities, including PBR and RRR Facilities | | |
| | X | | | Dilution not used as a substitute for treatment. | | 3 |
| | X | | | Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan. | | 7(b) |
| | X | | | Certification and/or notification sent with shipments of waste. | | 7(b)(4), (b)(5), (b)(6) |
| | | | | Land Disposal Facilities | | |
| | X | | | Facility tests wastes received to assure compliance with applicable treatment standards. | | 7(c)(2) |
| | X | | | Facility land disposes of restricted waste only if it meets applicable treatment standard. | | 40 |
| | X | | | Facility retains copies of generator notifications and certifications. | | 7(c)(1) |